

**PETER E. HEUSER, OSB No. 811281**

Email: heuser@khpatent.com

**BRANTLEY C. SHUMAKER, OSB No. 065093**

Email: brantley@khpatent.com

**KOLISCH HARTWELL, P.C.**

520 SW Yamhill Street, Suite 200

Portland, Oregon 97204

Phone: 503-224-6655

Facsimile: 503-295-6679

*Attorneys for Plaintiff*

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

**PALAZZO VINTAGE HOMES, LLC**, an  
Oregon company,

**PLAINTIFF,**

v.

**URBAN HOUSING DEVELOPMENT,  
LLC**, an Oregon company, **STEWARDSHIP  
REALTY, LLC**, an Oregon company, **DEZ  
DRAFTING & DESIGN, LLC**, an Oregon  
company, **VLADIMIR OZERUGA**, an  
individual, **E & O VENTURES, LLC**, an  
Oregon Company and **SLAVIK  
DEZHNYUK**, an individual,

**DEFENDANTS.**

**Case No. CV09-0952-JE**

**REQUEST TO ENTER DEFAULT  
AGAINST DEZ DRAFTING & DESIGN,  
LLC**

**TO: THE CLERK OF THE COURT**

Pursuant to Federal Rule of Civil Procedure 55(a) and Local Rule 55, Plaintiff Palazzo  
Vintage Homes, LLC ("Plaintiff"), through its attorneys of record, hereby respectfully requests

that the Clerk of the above-entitled Court enter default in this matter against defendant DEZ Drafting & Design LLC (“DEZ”) on the ground that DEZ has failed to appear or otherwise respond to the Second Amended Complaint within the time prescribed by the Federal Rules of Civil Procedure. Plaintiff served the Second Amended Complaint on DEZ on January 8, 2010, as evidenced by the certificate of service on file with this Court.

DATED this 1st day of February, 2010.

Respectfully submitted,

KOLISCH HARTWELL, P.C.

/s/ Brantley C. Shumaker

Brantley C. Shumaker, OSB No. 065093

*of Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the REQUEST TO ENTER DEFAULT AGAINST DEZ DRAFTING & DESIGN, LLC was served upon the following, and in the manner, as listed below:

Laura Taylor  
Renee Rothauge  
Bullivant Houser Bailey, PC  
888 S.W. Fifth Avenue, Suite 300  
Portland, OR 97204-2089  
Susan.Ford@bullivant.com  
Renee.Rothauge@bullivant.com

*Of Attorneys for Defendants Urban Housing  
Development, Stewardship Realty, and Vladimir  
Ozeruga.*

by first class and electronic mail

Slavik Dezhnyuk  
2866 Warwick Street  
West Linn, OR 97068

*Defendant*

by first class mail and electronic mail

on February 1, 2010.

DEZ Drafting and Design, LLC  
c/o Slavik Dezhnyuk  
2866 Warwick Street  
West Linn, OR 97068

*Defendant*

by first class mail and electronic mail

E & O Ventures, LLC  
c/o Olga Ozeruga  
7530 N. Willamette Blvd.  
Portland, OR 97203

*Defendant*

by first class mail

/s/ Brantley Shumaker  
Brantley C. Shumaker, OSB No. 065093  
Of Attorneys for Plaintiff